UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SUBJECT:	CLEAN AIR ACT INSPECTION REPORT BRP US, Inc – Marine Division
FROM:	Karina Kuc, Environmental Engineer AECAB (IL/IN)
THRU:	Nathan Frank, Section Supervisor AECAB (IL/IN)
TO:	File

BASIC INFORMATION

Facility Name: BRP US, Inc – Marine Division

Facility Location: 10101 Science Dr, Sturtevant, WI 53177

Date of Inspection: August 23, 2022

EPA Inspector(s):
1. Karina Kuc, Environmental Engineer
2. Brittany Cobb, Environmental Engineer
3. Meaghan Pashen, Environmental Engineer

Other Attendees:
1. Jason Kirby, Maintenance Coordinator

Contact Email Address: jason.kirby@brp.com

Purpose of Inspection: To assess compliance with the facility's permit and the Clean Air Act (CAA)

Facility Type: Marine vessel assembly and engine testing facility

Regulations Central to Inspection: The facility is subject to 40 CFR Part 63, Subpart WWWWWW, the Area Source Standard for Plating and Polishing Operations, however, plating and coating operations ceased in 2021. The permit has not been updated.

Arrival Time: 10:25 AM
Departure Time: 11:40 AM

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Provided Small Business Resource Information Sheet
☐ Small Business Resource Information Sheet not provided. Reason:
☒ Provided CBI warning to facility

The following information was obtained verbally from BRP US, Inc – Marine Division employees unless otherwise noted.

Process Description: BRP US, Inc – Marine Division (BRP or the facility) conducts several operations including, pontoon boat assembly, boat engine machining and assembly, and boat engine testing.

For pontoon assembly, the parts come in sanded and painted and are assembled on one assembly line.

For engine manufacturing, the raw material is aluminum castings, which are machined by CNC machine, washed and assembled into engines. The CNC machines are controlled by a SmogHog®. The facility does some fabrication welding, mostly of aluminum using aluminum mig welding rod. Grinding operations are vented to a wet scrubber which vents indoors.

The facility has an engine bay for research and development (R & D) testing of engine durability, which is controlled by a regenerative thermal oxidizer (RTO). The RTO runs at all times and does not utilize an idle mode.

Staff Interview: Due to the pandemic, the facility shut down in May 2020 and over the next 18 months, was repurposed to mainly assemble pontoon boats. Coating and plating operations permanently ceased, and the equipment was removed. One, unused RTO was removed. In early 2022, the facility reopened. A preventative maintenance schedule is followed for the RTO.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations: EPA observed the RTO, the engine testing bay, the welding stations, and the pontoon assembly line. The RTO readout indicated that the temperatures of the

two RTO chambers were 1685 and 1663 ºF. The facility's Permit No. 252008460-P21 stated that, "Whenever the regenerative thermal oxidizer (RTO) is in operation, the operating temperature of the thermal oxidizer shall be a minimum of 1550 degrees Fahrenheit". EPA requested documents related to RTO function and monitoring.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- RTO stack test
- Last 6 months of your RTO monitoring data including temperature and flow
- Last 6 months of RTO maintenance records
- Internal emissions spreadsheet since the facility reopened
- Pounds of welding rod used
- SDS for the welding rod
- Spec sheet for the metal being welded

Compliance Assistance: EPA expressed that the facility's permit should be updated to reflect current emission units and operations.

DIGITAL SIGNATURES

Report Author: KARINA KUC Digitally signed by KARINA KUC Date: 2022.10.03 13:17:32 -05'00'

Section Supervisor: Frank, Nathan Digitally signed by Frank, Nathan Date: 2022.10.04 16:45:39 -05'00'